

# **EXHIBIT L**

CASE 0:17-cr-00064-DWF-KMM Doc. 244-4 Filed 09/23/19 Page 2 of 4  
**Taxpayer Name:** ADAMS, EDWARD S & DENISE G **Examiner:** Becker, Kristopher  
LINARES  
**TIN:** 324-52-9009  
**Tax Form:** 1040 **Date:** 4/23/2015  
**Tax Year (s):** 200812, 200912, 201012

## CIVIL PENALTY APPROVAL FORM

### Conclusion:

<input checked="" type="checkbox"/> appropriate box below	Reason(s) for Non-Assertion of Penalty(s): IRM 4.10.6.7(1)  <b>No Change or Refund Case</b>
x	<b>Deficiency Case (Explanation required when adjustments made and penalties are not asserted. The applicable exceptions to the penalty must be documented.)</b>

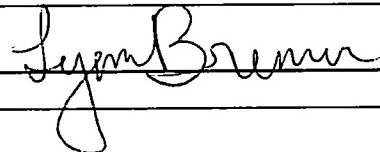
### Reason(s) for Assertion of Penalty(s) IRM 4.10.6.7(1)

**This was a deficiency case that was accepted as part of the Domestic Voluntary Disclosure Program. The taxpayers located capital gain income that had previously been excluded from the 2008, 2009 and 2010 income tax years, prepared amended returns, filed the amended returns with full payment of the liability. The taxpayers demonstrated a good faith effort to properly prepare the returns originally and were under no legal obligation to file these amended returns. As soon as the errors were located the taxpayer corrected and paid all liabilities owed.**

**As a result of the taxpayers reasonable preparation of the originally filed return, their locating the errors and correcting them in a reasonable manner and the demonstration of a good faith effort to ensure full compliance with the law there are no penalties being levied as part of this Domestic Voluntary Disclosure filing.**

**Group Manager Approval to Assess Penalties Identified Above  
and for Non-Assertion of Substantial Understatement Penalty  
Where Dollar Criteria for Penalty Has Been Met (IRM 20.1.5.1.6)**

Group Manager Signature:



Date: 4-24-15

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IRC	Penalty	IRM	Assert Penalty		Reference
			Yes	No	
<b>Penalties Not Requiring Group Managerial Approval</b>					
6651(a)(1)	Failure to File (Delinquent and non-filed returns) <i>(Lead Sheet available)</i>	20.1.2.2.7		X	
6651(a)(2)	Failure to Pay	20.1.2.2.8.4 and 20.1.2.2.10		X	
6654	Estimated Tax – Individual	20.1.3.2		X	
6655	Estimated Tax – Corporate	20.1.3.3		X	
IRC	Penalty	IRM	Assert Penalty		Reference
			Yes	No	
<b>Penalties Requiring Group Manager Approval</b>					
6651(f)	Fraudulent Failure To File, Civil	20.1.2.2.7.5		X	
6662(c)	Negligence <i>(Lead Sheet available)</i>	20.1.5.7		X	
6662(d)	Substantial Understatement <i>(Lead Sheet available)</i>	20.1.5.8		X	
6662(b)	Other Accuracy Related	20.1.5.1.1		X	
6662(h)	Gross Valuation Misstatement	20.1.5.9.4		X	
6662A	Accuracy Related Penalty on Understatements with Respect to Reportable Transactions	20.1.5.13		X	
6707A	Failure to Include Reportable Transactions Information with Return or Statement <i>(See MySB/SE Abusive Transactions website)</i>	20.1.5.13 and 4.32.2		X	
6663	Fraud <i>(Lead Sheet available)</i>	20.1.5.12		X	
	Alternative Penalty Position	20.1.5.12.2		X	
<b>Consideration of Preparer/Promoter/Material Advisor Penalties</b>				Consider Penalty	Reference
				Yes	
6694(a)	Preparer Penalties – Understatement Due to Unreasonable Positions <i>(Lead Sheet available)</i>	20.1.6.3.7		X	
6694(b)	Preparer Penalties – Understatement Due to Willful or Reckless Conduct <i>(Lead Sheet available)</i>	20.1.6.3.13		X	
6695(a)	Failure to Furnish Copy to Taxpayer	20.1.6.4.1		X	
6695(b)	Failure to Sign Return/Claim for Refund	20.1.6.4.2		X	
6695(c)	Failure to Furnish Identifying Number	20.1.6.4.3		X	
6695(d)	Failure to Retain Copy or List	20.1.6.4.4		X	
6695(e)	Failure to Maintain Record of Preparer's Employed	20.1.6.4.5		X	
6695(f)	Negotiation of Taxpayer's Refund Check	20.1.6.4.6		X	
6695(g)	Failure of Due Diligence with Eligibility for EIC	20.1.6.4.7		X	
6700	Promoting Abusive Tax Shelters	20.1.6.12		X	
6701	Aiding & Abetting Understatement of Tax Liability	20.1.6.13		X	
6707	Failure to Furnish Information Regarding Reportable Transactions	20.1.6.15		X	
6708	Failure to Maintain Lists of Advisees with Respect to Reportable Transactions	20.1.6.16		X	
6713	Unauthorized Disclosure or Use of Information	20.1.6.7		X	

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